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James Asher Lynch, III

Attorney and Counsellor at Law

66 West Eagle Road, Suite 100
Havertown, Pennsylvania 19083

Telephone: (610) 446-4340

Fax: (610) 446-8141

Reply to: Havertown Office

August 2, 2002

Ms. Joan Armstrong, Chief
PRP Investigation and Site
Information Section
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Required Submission of Additional Information
Lower Darby Creek Area Superfund Site -
Clearview Landfill, Folcroft Landfill and
Folcroft Landfill Annex

Dear Ms. Armstrong:

In reply to your letter of July 23, 2002 requesting additional information as set forth in Enclosure F, please find the requested information attached hereto in response to 14 specific questions.

Enclosed also find Amended Answers to the Enclosure F questions presented to Mr. Heller with your letter of July 3, 2002.

I trust these answers are satisfactory, If not, please call me.

Sincerely;

James Asher Lynch

10/1/01

ENCLOSURE F - ANSWERS TO INFORMATION REQUESTED

1. Suburban Waste Services, Inc., served as a subcontractor to City Wide Services, Inc. on one job in Darby Township. See attached Memorandum dated December 6, 2001.

2. City Wide sold three pieces of basically junk pieces for the sum of \$500.00 each. These three items included two tractors and one trailer.

3. (a) See one title transfer attached. Other two could not be located.

(b) These sales occurred on approximately November 2, 2001.

(c)-(d) See answers to 3(a) and (b).

4. No.

5. (a) Richard Heller was President until approximately two years ago. In early 2000, Michael Heller became President and Jonathan Heller became Treasurer.

(b) Shareholders are Jonathan Heller (40%), Michael Heller (40%) and Richard Heller (20%).

6. No.

7. All documents filed in Bankruptcy Court for the Eastern District of Pennsylvania were filed by and are in the possession of David Hamilton Lang, Esquire, 230 N. Monroe Street, Media, PA 19063.

8. City Wide Service, Inc., intends to reorganize under Chapter 11 of the Bankruptcy Code. A Plan of Reorganization has not yet been finalized and is not presently available.

9. City Wide Service, Inc., is a contract municipal waste hauler and conducts business from its offices at Avenue A and Darby Creek Road, Sharon Hill, PA 19079.

10. No.

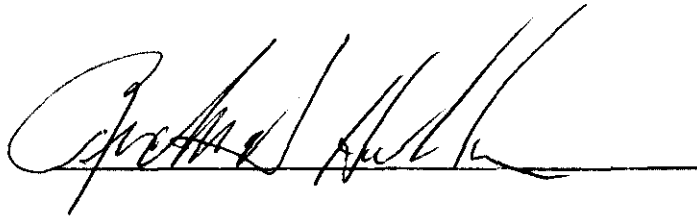
11. See attached Agreement referring to garage space and the use of three bays at City Wide Service facilities.

12. None.

13. Former employees of City Wide Services, Inc., that became employees of Suburban Waste Services, Inc., are Richard Hashim, Laborer, and Herman Brown, Laborer.

14. None.

8/2/02

A handwritten signature in cursive script, appearing to read "Richard Hashim", written over a horizontal line.

(TYPE OR PRINT) Certificate of Title must be submitted within 20 days, unless the purchaser is a registered dealer holding the vehicle for resale.

WARNING

PURCHASER AND SELLER HAVE AGREED THAT THEY STATE THE TRUTH IN CONNECTION WITH THE TRANSFER OF OWNERSHIP FAILURE TO COMPLY WITH THIS WARNING MAY BE CAUSE FOR AN OFFICIAL INVESTIGATION.

A. ASSIGNMENT OF TITLE I hereby certify that the vehicle is free of any encumbrances and that the ownership is hereby transferred to the person(s) in the dealer's name. I have verified that the vehicle is free of any encumbrances and that the ownership is hereby transferred to the person(s) in the dealer's name. SUBSCRIBED AND SWORN TO BEFORE ME: <u>Mark L. Lutz</u> MAY 3 1981 Notarial Seal: Mark Lutz, Notary Public, Philadelphia, Pennsylvania, Commission Expires Dec. 31, 2001. Member, Pennsylvania Association of Notaries		PURCHASER OR FULL BUSINESS NAME: <u>Reyes, Manuel</u> CO-PURCHASER: _____ STREET ADDRESS: <u>2011 Ferry Ave Apt N30</u> CITY: <u>CAMDEN</u> STATE: <u>NJ</u> ZIP: <u>08104</u> PURCHASE PRICE: <u>500.00</u> SELLER SIGNATURE: <u>Manuel Reyes</u> CO-PURCHASER SIGNATURE: _____ SELLER ADDRESS: _____ CO-PURCHASER ADDRESS: _____ SELLER SIGNATURE: _____ CO-PURCHASER SIGNATURE: _____ SELLER SIGNATURE: _____ CO-PURCHASER SIGNATURE: _____	
B. RE-ASSIGNMENT OF TITLE BY REGISTERED DEALER I hereby certify that the vehicle is free of any encumbrances and that the ownership is hereby transferred to the person(s) in the dealer's name. I have verified that the vehicle is free of any encumbrances and that the ownership is hereby transferred to the person(s) in the dealer's name. SUBSCRIBED AND SWORN TO BEFORE ME: _____ Notary Seal: _____ SELLER SIGNATURE: _____ CO-PURCHASER SIGNATURE: _____ SELLER SIGNATURE: _____ CO-PURCHASER SIGNATURE: _____		PURCHASER OR FULL BUSINESS NAME: _____ CO-PURCHASER: _____ STREET ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____ PURCHASE PRICE: _____ SELLER SIGNATURE: _____ CO-PURCHASER SIGNATURE: _____ SELLER SIGNATURE: _____ CO-PURCHASER SIGNATURE: _____	
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ALL SELLERS SIGNATURES ON THIS SIDE MUST BE NOTARIZED. SIGN ONLY IN THE PRESENCE OF AN OFFICIAL EMPLOYED TO ADMINISTER OATHS.



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mailing address:

P.O. Box 1235
Sharon Hill, PA 19079

Phone (610) 586-6722
FAX (610) 586-9999

DECEMBER 6 2001

RE: DARBY TOWNSHIP TRASH CONTRACT

SUBURBAN WASTE SERVICE AGREES TO REMOVE ALL RUBBISH AND WASTE FROM DARBY TWP. ACCORDING TO THE SPECIFICATIONS IN THE CONTRACT SIGNED BY CITY WIDE SERVICE AND DARBY TOWNSHIP FOR A PERIOD OF THREE YEARS NAMELY JANUARY 1 2001 to DECEMBER 31 2005:

CITY WIDE SERVICE WILL PAY TO SUBURBAN WASTE SERVICE THE SUM OF 19,000.00 PER. MONTH (NINETEEN THOUSAND) DOLLARS FOR THESE SERVICES

CITY WIDE SERVICE WILL ALLOW SUBURBAN WASTE SERVICE THE USE OF THREE BAYS OF GARAGE SPACE AT THE DARBY TWP. SITE FOR THE LENGTH OF THIS AGREEMENT AT NO CHARGE.

EITHER PARTY MAY CANCEL THIS AGREEMENT BY GIVING TO THE OTHER SIXTY (60) DAYS WRITTEN NOTICE.

ON BEHALF OF CITY WIDE SERVICE

ON BEHALF OF SUBURBAN WASTE SERVICE

JAMES ASHER LYNCH III
Attorney At Law
66 West Eagle Rd., Suite 100
Havertown, PA 19083

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Ms. Joan Armstrong, Chief
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